

## **REMARKS**

Applicants will address each of the Examiner's rejections in the order in which they appear in the Office Action.

### **Claim Rejections – 35 USC §103**

#### **Claims 28-31 and 40-43**

The Examiner now rejects Claims 28-31 and 40-43 under 35 USC §103(a) as being unpatentable over Zhang in view of Tabara. This rejection is respectfully traversed.

In order to advance the prosecution of this application, Applicants have amended independent Claim 28 to recite “a second insulating film formed on said second conductive layer, said first conductive layer and said first insulating film,” and Claim 40 to recite “a second insulating film formed on said second wiring, said first wiring and said first insulating film.”

In the Office Action, the Examiner contends that Zhang '701 discloses a first insulating film 112 and a second insulating film 117. However, as can be seen from Fig. 1 of Zhang '701, film 117 is not formed on film 112. Hence, this reference fails to disclose or suggest the claimed invention.

In addition, Tabara does not appear to disclose or suggest any insulating film on the first conductive film 22 and the second conductive film 18A and 20A. Hence, this reference fails to disclose or suggest the claimed invention.

Accordingly, the claims are patentable over these references, and it is requested that this rejection be withdrawn.

Claims 1-12, 19-24, 32-39 and 44-45

The Examiner also rejects Claims 1-12, 19-24, 32-39 and 44-45 under 35 USC §103(a) as being unpatentable over Zhang '701 in view of Tabara and further in view of Fukunaga. This rejection is respectfully traversed.

In order to advance the prosecution of this application, Applicants have amended the independent claims in a manner similar to that of Claims 28 and 40 discussed above to recite that the second insulating film is formed on the second conductive film (or metallic layer), the first conductive film (or metallic layer) and the first insulating film. As explained above, these features are not disclosed or suggested by any of the cited references. Hence, the claims are patentable over these references, and it is requested that the rejection over these references be withdrawn.

For at least the above-stated reasons, it is respectfully submitted that the claimed invention is patentable over the cited references, and it is requested that the §103 rejections be withdrawn.

Conclusion


It is respectfully submitted that the present application is in a condition for allowance and should be allowed.

If any fee is due for this amendment, please charge our deposit account 50/1039.

Favorable reconsideration is earnestly solicited.

Respectfully submitted,

Date: February 26, 2004

  
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